

# Exhibit

# A



Dave Briggman <briggman@gmail.com>

## Cease and Desist and Settlement Demand

6 messages

Zachary Lawrence <zach@zlawpllc.com>  
To: Dave Briggman <briggman@gmail.com>

Sun, Sep 17, 2023 at 5:00 PM

Mr. Briggman,

First, I do hope this email finds you well. It is unfortunate, but it appears as if you and I will be antagonists in a legal matter, which is generally what this email concerns. While, I truly do prefer not to be involved in litigation, such appears at this point necessary.

Second, please be aware I am sending the instant missive in the hopes of avoiding drawn out litigation and that it is to be kept confidential. Per my notice below, I would also note that the instant email should not be considered an "offer."

It has come to my attention that you've made a post identifying me and making false claims regarding violation of a statute that literally I am by definition incapable of violating. *See generally* 15 USC 1692a. The post is obviously--literally by law--false. I would ask that you retract the same immediately.

Further, beyond the false and defamatory nature of the post it appears that you have used my image without my consent, again, this is actionable and I would ask that you immediately remove the offending post and my image. You do not and never have had permission to use my image, portrait, or picture.

While there is very little I can imagine that you could now do to avoid litigation concerning this matter, you certainly can demonstrate some semblance of good faith and potentially avoid exemplary damages--those I am seeking--further, assuming the offending post was removed it would lower my expectation of recovery and thus a settlement offer that I would accept.

In the event that you wish to cut litigation short or avoid the unpleasantness that is concomitant with the same, I suggest you remove the offending post and send me a serious offer of settlement. There is nothing that can be done to avoid the filing of a lawsuit, but in the event you make an economically rational offer of settlement I will accept it. In the interest of being transparent, I am economically driven in legal matters and as my opportunity cost rises so too would the compensation necessary to settle.

I will at this point only reply to communications that contain serious offers of settlement or concern the litigation, please do not expect for me to reply to communications that do not further those goals.

With my best,

Zachary Lawrence

Lawrence Law Firm PLLC

166 Five Acres Ln  
Cold Brook, NY 13324

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